

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JULIA JIN-WOLFSON,

Plaintiff,

v.

LAFAYETTE COLLEGE,

Defendant.

CIVIL ACTION NO. 23-CV-4005-JMG

**STIPULATION AND PROPOSED ORDER EXTENDING THE TIME FOR
DEFENDANT LAFAYETTE COLLEGE TO RESPOND TO COMPLAINT**

WHEREAS, the Complaint in the above-referenced putative class action was filed on October 17, 2023 and served on Defendant Lafayette College (“Lafayette”) on October 19, 2023; and,

WHEREAS, Lafayette’s deadline to answer or otherwise respond to the Complaint is presently November 9, 2023; and,

WHEREAS, Ballard Spahr was only recently retained to represent Lafayette in this matter; and,

WHEREAS, counsel for the parties met and conferred by telephone on November 6, 2023 and agreed to stipulate to an extension for Lafayette to respond to the Complaint; and,

WHEREAS, Lafayette has not previously sought nor obtained any extension to respond to the Complaint; and,

WHEREAS, no Scheduling Order has been entered in this matter and therefore the extension requested will not affect the timing of summary judgment motions or trial;

IT IS hereby STIPULATED and AGREED by and among the undersigned counsel that the time for Lafayette to respond to the Complaint shall be extended until **December 7, 2023**.

LYNCH CARPENTER, LLP

BALLARD SPAHR, LLP

/s/ Gary F. Lynch

Gary F. Lynch
Jamisen A. Etzel
Nicholas A. Colella
1133 Penn Avenue, 5th Floor
Pittsburgh, PA 15222
(412) 322-9243
gary@lcllp.com
jamisen@lcllp.com
nickc@lcllp.com

Michael A. Tompkins, Esq.
Anthony Alesandro
LEEDS BROWN LAW, P.C.
One Old Country Road, Suite 347
Carle Place, NY 11514
(516) 873-9550
mtompkins@leedsbrownlaw.com
aalesandro@leedsbrownlaw.com

Attorneys for Plaintiff Julia Jin-Wolfson

Dated: November 6, 2023

IT IS SO ORDERED

November 7, 2023

/s/ Marcel S. Pratt

Marcel S. Pratt
Burt M. Rublin
John W. Scott
1735 Market Street, Fl. 51
Philadelphia, PA 19103-7599
(215) 665-8500
prattm@ballardspahr.com
rublin@ballardspahr.com
scottj@ballardspahr.com

Attorneys for Defendant Lafayette College

/s/ John M. Gallagher

Hon. John M. Gallagher
United States District Judge